

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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August 31, 2020

**BY ECF**

The Honorable Judge Paul A. Engelmayer  
United States District Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Zoilo Taveras  
20 CR. 240 (PAE)**

Dear Judge Engelmayer:

With the consent of the Government and the Pretrial Services Agency, I write to respectfully request that the Court modify Mr. Taveras's conditions of release to remove him from home detention and place him on location monitoring with a curfew set by the Pretrial Services Agency.

On April 2, 2020, Mr. Taveras was released from the MCC and the following bail conditions were imposed: a \$20,000 personal recognizance bond co-signed by two financially responsible persons; Home detention, to be enforced by electronic monitoring; Travel limited to SDNY/EDNY; Surrender travel documents and no new applications; Substance abuse and mental health evaluations as directed by Pretrial; Defendant is not to possess any firearms or other destructive devices. According to Mr. Taveras's Pretrial Services Officer John Moscato, he has been compliant with his conditions of release.

Mr. Taveras requests that the Court remove the condition of home detention and place him on location monitoring with a curfew determined by Pretrial. This modification would allow Mr. Taveras to resume grocery shopping and running everyday errands for his family. It would also permit Mr. Taveras to engage in regular exercise outside of his apartment to maintain his health. As noted above, the Government and Pretrial Services have no objection to this proposed modification.

Thank you for your consideration of this request.

Respectfully submitted,

/s/  
Zawadi Baharanyi  
Assistant Federal Defender  
917-612-2753

**GRANTED.** The Court orders the removal of the condition of home confinement and imposes a curfew, to be determined by the Pretrial Services Department. The Clerk of Court is directed to terminate the motion at Dkt. No. 19.

8/31/2020

SO ORDERED.



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PAUL A. ENGBLMAIER  
United States District Judge